NOTICE OF SPCC INSPECTION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6

Date: 8-21-18	Lead Inspector (Print Name & Sign): Chris Perry	Inspection Number: SPCC-LA-2018-259
Additional Inspectors:		

Facility Name: Hackberry Field	Facility Address: unnamed dirt rd, Hackberry, LA	Facility Type: oil production
Facility Phone:	Facility Email:	Facility Fax:

The purpose of today's inspection is to determine compliance with Section 311 of the Clean Water Act (the "Act"), 33 U.S.C. § 1321, and the Oil Pollution Prevention regulations found at 40 C.F.R. Part 112 (the "Regulations"). The scope of the inspection and plan review process may include, but is not limited to, reviewing and obtaining copies of documents and records; interviewing facility personnel; a physical inspection of the facility (including process areas); taking photographs or video; collecting samples; and other activities necessary to determine compliance with the Act and the regulations.

Please review this Notice of SPCC Inspection ("Notice") carefully Note that any deficiencies identified by the inspector and communicated to you during the closing conference are the inspector's observations and not a determination of compliance.

Please be advised that any noncompliance with the Regulations may constitute a violation under the Act for which penalties or other relief may be sought. Penalties may be assessed upon subsequent findings by the Administrator or a court that the facility has violated the Act and/or the regulations. The United States Environmental Protection Agency ("EPA") reserves its right to initiate an enforcement action under the Act and any other applicable law, to seek penalties and other appropriate relief, for any violation of the Act, the Regulations, or such other laws. This Notice and other relevant information will be reviewed by appropriate EPA personnel to determine if any deficiencies, identified in such review, constitute violations of the Act and the Regulations and whether an enforcement action is appropriate. EPA will provide written correspondence describing any deficiencies identified during the inspection.

If deficiencies with the Regulations were identified during the inspection and communicated to you during the closing conference you are urged to correct such deficiencies as soon as possible. EPA requests you submit all information, as soon as possible, evidencing your correction of the deficiencies to:

Chris Perry
U.S. Environmental Protection Agency
Perry.chris@epa.gov

If it is not feasible to correct the deficiencies within **30 days** of the date of the inspection, immediately submit a detailed explanation and schedule indicating by when the noted deficiencies will be corrected. If you believe that your facility is not required to have an SPCC Plan, or is in compliance with the SPCC regulatory requirements, submit an explanation, supported by documentation, as to why the facility is not subject to the SPCC provision of the Oil Pollution Prevention regulations at 40 C.F.R Part 112 or meets its requirements within **30 days** of the date of the inspection.

Confidential Business Information

For the information submitted to EPA, you may be entitled to claim it as Confidential Business Information (CBI) pursuant to the regulations set forth in 40 C.F.R. Part 2. If EPA determines the information you have designated meets the criteria in 40 C.F.R. § 2.208, the information will be disclosed only to the extent and by means of the procedures specified in 40 C.F.R. Part 2 Subpart B. Unless CBI is claimed, EPA may make the information available to the public without further notice to you.

Acknowledgement of Inspection

Signature of Facility Representative: Jeff Meaux

Name & Title of Facility Representative: Jeff Meaux, Environmental Coordinator

90069301

FACILITY INFORMATION			
FACILITY NAME: Hack Berry Field Facilities (1+5)			
LATITUDE: 30.00074	LONGITUDE: -93.42118	GPS DATUM: Google Earth	
Section/Township/Range:	FRS#/OIL DATABASE ID: Rle-LA-410	ICIS#:	
ADDRESS: Unnamed dirt rd			
CITY: Hack Berry	STATE: LA	ZIP:	COUNTY: Cameron
MAILING ADDRESS (IF DIFFERENT FROM FACILITY ADDRESS – IF NOT, PRINT "SAME"):			
CITY:	STATE:	ZIP:	COUNTY:
TELEPHONE: 337-577-8465	FACILITY CONTACT NAME/TITLE: Chris Sanfilippo Env Mgr		
OWNER NAME: Texas Petroleum Investment Company			
OWNER ADDRESS: 5850 San Felipe Rd; ste 250			
CITY: Houston	STATE: Tx	ZIP: 77057	COUNTY: Harris
TELEPHONE: 713-789-9225	FAX:	EMAIL: CSanfilippo@tpii.com	
FACILITY OPERATOR NAME (IF DIFFERENT FROM OWNER – IF NOT, PRINT "SAME"): SAME			
OPERATOR ADDRESS:			
CITY:	STATE:	ZIP:	COUNTY:
TELEPHONE:	OPERATOR CONTACT NAME/TITLE:		
FACILITY TYPE: Oil production facility		NAICS CODE: 211111	
HOURS PER DAY FACILITY ATTENDED: < 8hrs	TOTAL FACILITY CAPACITY: ~~122,153~~ gal 385,250		
TYPE(S) OF OIL STORED: Crude; produced water			
LOCATED IN INDIAN COUNTRY? ☐ YES ☑ NO RESERVATION NAME:			
INSPECTION/PLAN REVIEW INFORMATION			
PLAN REVIEW DATE: 8/15/18	REVIEWER NAME: Chris Perry		
INSPECTION DATE: 8/21/18	TIME: 1200	ACTIVITY ID NO: SPCC-LA-2018-259	
LEAD INSPECTOR: Chris Perry			
OTHER INSPECTOR(S):			
INSPECTION ACKNOWLEDGMENT			
I performed an SPCC inspection at the facility specified above.			
INSPECTOR SIGNATURE:		DATE:	
SUPERVISOR REVIEW/SIGNATURE:		DATE:	

SPCC GENERAL APPLICABILITY—40 CFR 112.1

IS THE FACILITY REGULATED UNDER 40 CFR part 112?

- The completely buried oil storage capacity is over 42,000 U.S. gallons, **OR** the aggregate aboveground oil storage capacity is over 1,320 U.S. gallons **AND** — ☑ Yes ☐ No
- The facility is a non-transportation-related facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States — ☑ Yes ☐ No

AFFECTED WATERWAY(S): Black Lake Bayou | DISTANCE: 532 ft

FLOW PATH TO WATERWAY:

The facility drains into Black Lake Bayou

Note: The following storage capacity is not considered in determining applicability of SPCC requirements:

- *Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993; Tank trucks that return to an otherwise regulated facility that contain only residual amounts of oil (EPA Policy letter)*
- *Completely buried tanks subject to all the technical requirements of 40 CFR part 280 or a state program approved under 40 CFR part 281;*
- *Underground oil storage tanks deferred under 40 CFR part 280 that supply emergency diesel generators at a nuclear power generation facility licensed by the Nuclear Regulatory Commission (NRC) and subject to any NRC provision regarding design and quality criteria, including but not limited to CFR part 50;*
- *Any facility or part thereof used exclusively for wastewater treatment (production, recovery or recycling of oil is not considered wastewater treatment); (This does not include other oil containers located at a wastewater treatment facility, such as generator tanks or transformers)*
- *Containers smaller than 55 U.S. gallons;*
- *Permanently closed containers (as defined in §112.2);*
- *Motive power containers (as defined in §112.2);*
- *Hot-mix asphalt or any hot-mix asphalt containers;*
- *Heating oil containers used solely at a single-family residence;*
- *Pesticide application equipment and related mix containers;*
- *Any milk and milk product container and associated piping and appurtenances; and*
- *Intra-facility gathering lines subject to the regulatory requirements of 49 CFR part 192 or 195.*

Does the facility have an SPCC Plan? ☑ Yes ☐ No

FACILITY RESPONSE PLAN (FRP) APPLICABILITY —40 CFR 112.20(f)

A non-transportation related onshore facility is required to prepare and implement an FRP as outlined in 40 CFR 112.20 if:

- ☐ The facility transfers oil over water to or from vessels and has a total oil storage capacity greater than or equal to 42,000 U.S. gallons, **OR**
- ☐ The facility has a total oil storage capacity of at least 1 million U.S. gallons, **AND** at least one of the following is true:
  - ☐ The facility does not have secondary containment sufficiently large to contain the capacity of the largest aboveground tank plus sufficient freeboard for precipitation.
  - ☐ The facility is located at a distance such that a discharge could cause injury to fish and wildlife and sensitive environments.
  - ☐ The facility is located such that a discharge would shut down a public drinking water intake.
  - ☐ The facility has had a reportable discharge greater than or equal to 10,000 U.S. gallons in the past 5 years.

Facility has FRP: ☐ Yes ☐ No ☑ NA | FRP Number:

Facility has a completed and signed copy of Appendix C, Attachment C-II, "Certification of the Applicability of the Substantial Harm Criteria." ☑ Yes ☐ No

Comments:

REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC PLAN—40 CFR 112.3		
Date facility began operations: 1940		
Date of initial SPCC Plan preparation: Aug 2008	Current Plan version (date/number): May 2015	
112.3(a)	**For drilling, production or workover facilities, including mobile or portable facilities, that are offshore or have an offshore component; or facilities required to have and submit a FRP:** • In operation on or prior to November 10, 2010: Plan prepared and/or amended and fully implemented by **November 10, 2010** • Facilities beginning operation after November 10, 2010: o Plan prepared and fully implemented before drilling and workover facilities begin operations; or o Plan prepared and fully implemented within six months after oil production facilities begin operations	☑ Yes ☐ No ☐ NA ☐ Yes ☐ No ☑ NA ☐ Yes ☐ No ☑ NA
112.3(d)	Plan is certified by a registered Professional Engineer (PE) and includes statements that the PE attests: • PE is familiar with the requirements of 40 CFR part 112 • PE or agent has visited and examined the facility • Plan is prepared in accordance with good engineering practice including consideration of applicable industry standards and the requirements of 40 CFR part 112 • Procedures for required inspections and testing have been established • Plan is adequate for the facility • For produced water containers subject to 112.9(c)(6), any procedure to minimize the amount of free-phase oil is designed to reduce the accumulation of free-phase oil and the procedures and frequency for required inspections, maintenance and testing have been established and are described in the Plan, if applicable	☑ Yes ☐ No ☐ NA ☑ Yes ☐ No ☐ NA ☑ Yes ☐ No ☐ NA ☑ Yes ☐ No ☐ NA ☑ Yes ☐ No ☐ NA ☐ Yes ☐ No ☑ NA
PE Name: Allison Freeby	License No.: 32492	State: LA	Date of certification: 4/15/15
112.3(e)(1)	Plan is available onsite if attended at least 4 hours per day. If facility is unattended, Plan is available at the nearest field office. *(Please note nearest field office contact information in comments section below.)*	☑ Yes ☐ No ☐ NA

AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA)—40 CFR 112.4		
112.4(a),(c)	Has the facility discharged more than 1,000 U.S. gallons of oil in a single reportable discharge or more than 42 U.S. gallons in each of two reportable discharges in any 12-month period?[1]	☐ Yes ☑ No
If **YES**	• Was information submitted to the RA as required in §112.4(a)?[2]	☐ Yes ☐ No ☐ NA
	• Was information submitted to the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located§112.4(c)	☐ Yes ☐ No ☐ NA
	• Date(s) and volume(s) of reportable discharges(s) under this section:	
	• Were the discharges reported to the NRC[3]?	☐ Yes ☐ No
112.4(d),(e)	Have changes required by the RA been implemented in the Plan and/or facility?	☐ Yes ☐ No ☐ NA

Comments:

[1] A reportable discharge is a discharge as described in §112.1(b)(see 40 CFR part 110). The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

[2] Triggering this threshold may disqualify the facility from meeting the Qualified Facility criteria if it occurred in the three years prior to self certification

[3] Inspector Note-Confirm any spills identified above were reported to NRC

AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5		
112.5(a)	Has there been a change at the facility that materially affects the potential for a discharge described in §112.1(b)?	☐ Yes ☑ No
If **YES**	• Was the Plan amended within six months of the change?	☐ Yes ☐ No
	• Were amendments implemented within six months of any Plan amendment?	☐ Yes ☐ No
112.5(b)	Review and evaluation of the Plan completed at least once every 5 years?	☑ Yes ☐ No ☐ NA
	Following Plan review, was Plan amended within six months to include more effective prevention and control technology that has been field-proven to significantly reduce the likelihood of a discharge described in §112.1(b)?	☐ Yes ☐ No ☑ NA
	Amendments implemented within six months of any Plan amendment?	☐ Yes ☐ No ☑ NA
	Five year Plan review and evaluation documented?	☑ Yes ☐ No ☐ NA
112.5(c)	Professional Engineer certification of any technical Plan amendments in accordance with all applicable requirements of §112.3(d) *[Except for self-certified Plans]*	☐ Yes ☐ No ☑ NA

Name:	License No.:	State:	Date of certification:

Reason for amendment:

Comments:

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
Management approval at a level of authority to commit the necessary resources to fully implement the Plan[4]		☑ Yes ☐ No	
Plan follows sequence of the rule or is an equivalent Plan meeting all applicable rule requirements and includes a cross-reference of provisions		☑ Yes ☐ No ☐ NA	
If Plan calls for facilities, procedures, methods, or equipment not yet fully operational, details of their installation and start-up are discussed *(Note: Relevant for inspection evaluation and testing baselines.)*		☐ Yes ☐ No ☑ NA	
112.7(a)(2)	The Plan includes deviations from the requirements of §§112.7(g), (h)(2) and (3), and (i) and applicable subparts B and C of the rule, except the secondary containment requirements in §§112.7(c) and (h)(1), 112.9(c)(2), 112.9(d)(3), and 112.10(c)	☐ Yes ☐ No ☑ NA	
If **YES**	• The Plan states reasons for nonconformance	☐ Yes ☐ No ☑ NA	
	• Alternative measures described in detail and provide equivalent environmental protection *(Note: Inspector should document if the environmental equivalence is implemented in the field, in accordance with the Plan's description)*	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA

Describe each deviation and reasons for nonconformance:

[4] May be part of the Plan or demonstrated elsewhere.

		PLAN	FIELD
112.7(a)(3)	Plan describes physical layout of facility and includes a diagram[5] that identifies: • Location and contents of all regulated fixed oil storage containers • Storage areas where mobile or portable containers are located • Completely buried tanks otherwise exempt from the SPCC requirements (marked as "exempt") • Transfer stations • Connecting pipes, including intra-facility gathering lines that are otherwise exempt from the requirements of this part under §112.1(d)(11)	☑ Yes ☐ No	☑ Yes ☐ No
	Plan addresses each of the following:		
(i)	For each fixed container, type of oil and storage capacity (see Attachment A of this checklist). For mobile or portable containers, type of oil and storage capacity for each container or an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities	☑ Yes ☐ No	☑ Yes ☐ No
(ii)	Discharge prevention measures, including procedures for routine handling of products (loading, unloading, and facility transfers, etc.)	☑ Yes ☐ No	☑ Yes ☐ No
(iii)	Discharge or drainage controls, such as secondary containment around containers, and other structures, equipment, and procedures for the control of a discharge	☑ Yes ☐ No	☑ Yes ☐ No
(iv)	Countermeasures for discharge discovery, response, and cleanup (both facility's and contractor's resources)	☑ Yes ☐ No	☑ Yes ☐ No
(v)	Methods of disposal of recovered materials in accordance with applicable legal requirements	☑ Yes ☐ No	
(vi)	Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with an agreement for response, and all Federal, State, and local agencies who must be contacted in the case of a discharge as described in §112.1(b)	☑ Yes ☐ No	
112.7(a)(4)	***Does not apply if the facility has submitted an FRP under §112.20:*** Plan includes information and procedures that enable a person reporting an oil discharge as described in §112.1(b) to relate information on the: • Exact address or location and phone number of the facility; • Date and time of the discharge; • Type of material discharged; • Estimates of the total quantity discharged; • Estimates of the quantity discharged as described in §112.1(b); • Source of the discharge; • Description of all affected media; • Cause of the discharge; • Damages or injuries caused by the discharge; • Actions being used to stop, remove, and mitigate the effects of the discharge; • Whether an evacuation may be needed; and • Names of individuals and/or organizations who have also been contacted	☑ Yes ☐ No ☐ NA	
112.7(a)(5)	***Does not apply if the facility has submitted a FRP under §112.20:*** Plan organized so that portions describing procedures to be used when a discharge occurs will be readily usable in an emergency	☑ Yes ☐ No ☐ NA	
112.7(b)	Plan includes a prediction of the direction, rate of flow, and total quantity of oil that could be discharged for each type of major equipment failure where experience indicates a reasonable potential for equipment failure	☑ Yes ☐ No ☐ NA	
Comments:			

[5] Note in comments any discrepancies between the facility diagram, the description of the physical layout of facility, and what is observed in the field

		PLAN	FIELD
112.7(c)	Appropriate containment and/or diversionary structures or equipment are provided to prevent a discharge as described in §112.1(b), **except as provided in §112.7(k) of this section for certain qualified operational equipment and §112.9(d)(3) for certain flowlines and intra-facility gathering lines at an oil production facility**. The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs. The method, design, and capacity for secondary containment address the typical failure mode and the most likely quantity of oil that would be discharged. See Attachment A of this checklist. **For offshore facilities**, one of the following or its equivalent: • Curbing or drip pans; • Sumps and collection systems; For onshore facilities, one of the following or its equivalent: • Dikes, berms, or retaining walls sufficiently impervious to contain oil; • Curbing or drip pans; • Sumps and collection systems; • Culverting, gutters or other drainage systems; • Weirs, booms or other barriers; • Spill diversion ponds; • Retention ponds; or • Sorbent materials.		
	Identify which of the following are present at the facility and if appropriate containment and/or diversionary structures or equipment are provided as described above:		
	☑ Bulk storage containers	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	☑ Mobile/portable containers	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	☑ Oil-filled operational equipment (as defined in 112.2)	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	☐ Other oil-filled equipment (i.e., manufacturing equipment)	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	☑ Piping and related appurtenances	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	☐ Mobile refuelers or non-transportation-related tank cars	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	☑ Transfer areas, equipment and activities	☑ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA
	☐ Identify any other equipment or activities that are not listed above:	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
112.7(d)	Secondary containment for one (or more) of the following provisions is determined to be impracticable: ☐ General secondary containment §112.7(c) ☐ Bulk storage containers §§112.8(c)(2)/112.12(c)(2) ☐ Loading/unloading rack §112.7(h)(1) ☐ Mobile/portable containers§§112.8(c)(11)/112.12(c)(11)	☐ Yes ☑ No	[redacted]
If YES	• The impracticability of secondary containment is clearly demonstrated and described in the Plan	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	• For bulk storage containers,[6] periodic integrity testing of containers and integrity and leak testing of the associated valves and piping is conducted	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	(Does not apply if the facility has submitted a FRP under §112.20): • Contingency Plan following the provisions of 40 CFR part 109 is provided (see Attachment C of this checklist) **AND**	☐ Yes ☐ No ☑ NA	[redacted]
	• Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA

Comments:
leaking tank that need to be repaired

[6] These additional requirements apply only to bulk storage containers, when an impracticability determination has been made by the PE

		PLAN	FIELD
112.7(e)	Inspections and tests conducted in accordance with written procedures	☑ Yes ☐ No	☑ Yes ☐ No
monthly	Record of inspections or tests signed by supervisor or inspector	☑ Yes ☐ No	☑ Yes ☐ No
	Kept with Plan for at least 3 years (see Attachment B of this checklist)[7]	☑ Yes ☐ No	☑ Yes ☐ No
112.7(f)	Personnel, training, and oil discharge prevention procedures		
(1)	Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and contents of SPCC Plan	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(2)	Person designated as accountable for discharge prevention at the facility and reports to facility management	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(3)	Discharge prevention briefings conducted at least once a year for oil handling personnel to assure adequate understanding of the Plan. Briefings highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.7(h)	Tank car and tank truck loading/unloading rack[8] is present at the facility		☐ Yes ☑ No
	Loading/unloading rack means a fixed structure (such as a platform, gangway) necessary for loading or unloading a tank truck or tank car, which is located at a facility subject to the requirements of this part. A loading/unloading rack includes a loading or unloading arm, and may include any combination of the following: piping assemblages, valves, pumps, shut-off devices, overfill sensors, or personnel safety devices.		
If **YES** (1)	Does loading/unloading rack drainage flow to catchment basin or treatment facility designed to handle discharges or use a quick drainage system?	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	Containment system holds at least the maximum capacity of the largest single compartment of a tank car/truck loaded/unloaded at the facility	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
(2)	An interlocked warning light or physical barriers, warning signs, wheel chocks, or vehicle brake interlock system in the area adjacent to the **loading or unloading rack** to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
(3)	Lower-most drains and all outlets on tank cars/trucks inspected prior to filling/departure, and, if necessary ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
112.7(i)	Brittle fracture evaluation of field-constructed aboveground containers is conducted after tank repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or after a discharge/failure due to brittle fracture or other catastrophe, and appropriate action taken as necessary (applies to only field-constructed aboveground containers in production service, drilling, and workover service)	☑ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA
112.7(j)	Discussion of conformance with applicable more stringent State rules, regulations, and guidelines and other effective discharge prevention and containment procedures listed in 40 CFR part 112	☑ Yes ☐ No ☐ NA	
Comments:			

[7] Records of inspections and tests kept under usual and customary business practices will suffice

[8] Note that a tank car/truck loading/unloading rack must be present for §112.7(h) to apply. Though this requirement applies to all facilities, loading and unloading rack equipment is often not present at typical offshore production facilities.

		PLAN	FIELD
112.7(k)	Qualified oil-filled operational equipment is present at the facility[9] *Oil-filled operational equipment* means equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil-filled operational equipment is not considered a bulk storage container, and does not include oil-filled manufacturing equipment (flow-through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems; lubricating systems (e.g., those for pumps, compressors and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device.		☑ Yes ☐ No
If YES	Check which apply: Secondary Containment provided in accordance with 112.7(c) ☑ Alternative measure described below (confirm eligibility) ☐		
112.7(k)	Qualified Oil-Filled Operational Equipment • Has a single reportable discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons occurred within the three years prior to Plan certification date?		☐ Yes ☐ No ☑ NA
	• Have two reportable discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?[10]		☐ Yes ☐ No ☑ NA
	If YES for either, secondary containment in accordance with §112.7(c) is required		
	• Facility procedure for inspections or monitoring program to detect equipment failure and/or a discharge is established and documented	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	Does not apply if the facility has submitted a FRP under §112.20:		
	• Contingency plan following 40 CFR part 109 (see Attachment C of this checklist) is provided in Plan **AND**	☐ Yes ☐ No ☑ NA	
	• Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is provided in Plan	☐ Yes ☐ No ☑ NA	
OFFSHORE OIL DRILLING, PRODUCTION OR WORKOVER FACILITIES—40 CFR 112.11		**PLAN**	**FIELD**
112.11(b)	Oil drainage collection equipment used to prevent and control small discharges around pumps, glands, valves, flanges, expansion joints, hoses, drain lines, separators, treaters, tanks, and associated equipment	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	Facility drains are controlled and directed toward a central collection sump to prevent a discharge as described in §112.1(b); if drains and sumps not practicable, oil in collection equipment removed as often as necessary to prevent overflow	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.11(c)	For facilities using a sump system, sump and drains adequately sized	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	For facilities using a sump system, spare pump available to remove liquids and assure that oil does not escape	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	Regularly scheduled preventive maintenance inspection and testing program to assure reliable operation of liquid removal system and pump start-up device	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	Redundant automatic sump pumps and control devices are installed if necessary	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
Comments:			

[9] This provision does not apply to oil-filled manufacturing equipment (flow-through process).

[10] A reportable discharge is a discharge as described in §112.1(b)(see 40 CFR part 110). Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

		PLAN	FIELD
112.11(d)	If separators and treaters are equipped with dump valves which predominantly fail in the closed position and where pollution risk is high, facility equipped to prevent discharges by: • Extending the flare line to a diked area if the separator is near shore; • Equipping separator with high liquid level sensor to automatically shut in wells producing to the separator; or • Installing parallel redundant dump valves.	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.11(e)	Atmospheric storage or surge containers equipped with high liquid level sensing devices that activate an alarm or control the flow, or otherwise prevent discharges	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.11(f)	Pressure containers equipped with high and low pressure sensing devices that activate an alarm or control the flow	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.11(g)	Containers equipped with suitable corrosion protection	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.11(h)	Written procedures maintained in the SPCC Plan for inspecting and testing pollution prevention equipment and systems	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.11(i)	Testing and inspection of pollution prevention equipment and systems conducted on a scheduled periodic basis commensurate with the complexity, conditions, and circumstances of the facility and any other applicable regulations.	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	Simulated discharges are used for testing and inspecting human and equipment pollution control and countermeasure systems	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.11(j)	Detailed records are provided that describe surface and subsurface well shut-in valves and devices in use at the facility for each well.	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	Records are sufficient to determine the method of activation or control, such as pressure differential, change in fluid or flow conditions, combination of pressure and flow, or manual or remote control mechanisms	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.11(k)	Blowout prevention (BOP) assembly and well control system installed before drilling below any casing string and during workover operations	☑ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA
	BOP assembly and well control system capable of controlling any well-head pressure that may be encountered while on the well	☑ Yes ☐ No ☐ NA	☐ Yes ☐ No ☑ NA
112.11(l)	Manifolds (headers) equipped with check valves on individual flowlines	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.11(m)	If the shut-in well pressure is greater than the working pressure of the flowline and manifold valves up to and including the header valves, flowlines are equipped with a high pressure sensing device and shut-in valve at the wellhead, **OR** pressure relief system provided for flowlines	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.11(n)	Piping appurtenant to the facility is protected from corrosion, such as with protective coatings or cathodic protection corrosion inhibitor	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.11(o)	Sub-marine piping appurtenant to the facility is protected against environmental stresses and other activities such as fishing operations buried	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.11(p)	Sub-marine piping maintained in good operating condition at all times. Piping periodically inspected or tested on a regular schedule for failures. Documentation of inspections or tests kept at facility. Annual	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA

? all of them ?

Comments:

*Updated

Go over Sect 3-1 where it says piping is submerged or inside containment

ATTACHMENT A ONSHORE FACILITIES (EXCLUDING PRODUCTION) 40 CFR 112.8/112.12	☑ NA	PLAN	FIELD
112.8(b)/ 112.12(b) Facility Drainage			
Diked Areas (1)	Drainage from diked storage areas is: • Restrained by valves, except where facility systems are designed to control such discharge, **OR** • Manually activated pumps or ejectors are used and the condition of the accumulation is inspected prior to draining dike to ensure no oil will be discharged	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
Comments:			

112.8(c)/112.12(c) Bulk Storage Containers ☑ NA

Bulk storage container means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.

If bulk storage containers are not present, mark this section Not Applicable (NA). If present, complete this section and Attachment C of this checklist.

(1)	Containers materials and construction are compatible with material stored and conditions of storage such as pressure and temperature	☑ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(3)	Is there drainage of uncontaminated rainwater from diked areas into a storm drain or open watercourse?	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
If **YES**	Bypass valve normally sealed closed	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	• Retained rainwater is inspected to ensure that its presence will not cause a discharge as described in §112.1(b)	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	• Bypass valve opened and resealed under responsible supervision	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	• Adequate records of drainage are kept; for example, records required under permits issued in accordance with 40 CFR §§122.41(j)(2) and (m)(3)	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
(4)	For completely buried metallic tanks installed on or after January 10, 1974 (if not exempt from SPCC regulation because subject to all of the technical requirements of 40 CFR part 280 or 281): • Provide corrosion protection with coatings or cathodic protection compatible with local soil conditions	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	• Regular leak testing conducted	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
(5)	The buried section of partially buried or bunkered metallic tanks protected from corrosion with coatings or cathodic protection compatible with local soil conditions	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA

not discussed

Comments:

update

ATTACHMENT A		PLAN	FIELD
(6)	Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. Techniques include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other system of non-destructive testing	☑ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
STI spool 10yr ext 20yr int.	Appropriate qualifications for personnel performing tests and inspections are identified in the Plan and have been assessed in accordance with industry standards	☑ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	• The frequency and type of testing and inspections are documented, are in accordance with industry standards and take into account the container size, configuration and design	☑ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	• Comparison records of aboveground container integrity testing are maintained	☑ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	• Container supports and foundations regularly inspected	☑ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	• Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas	☑ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	• Records of all inspections and tests maintained[11]	☑ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
Integrity Testing Standard identified in the Plan: ★ Diesel tank externally inspected every 10 yrs ★Double walled tank now used (removed from plan)			
112.12 (c)(6)(ii) *(Applies to AFVO Facilities only)*	Conduct ~~formal visual inspection on a regular schedule~~ for bulk storage containers that meet all of the following conditions: • Subject to 21 CFR part 110; • Elevated; • Constructed of austenitic stainless steel; • Have no external insulation; and • Shop-fabricated.	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas.	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	You must determine and document in the Plan the appropriate qualifications for personnel performing tests and inspections.[11]	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
(10)	Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.8(d)/112.12(d)Facility transfer operations, pumping, and facility process			
(4)	Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly to assess their general condition	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	Integrity and leak testing conducted on buried piping at time of installation, modification, construction, relocation, or replacement	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA

Comments:

Add discussion for DW tank.

[11] Records of inspections and tests kept under usual and customary business practices will suffice

ATTACHMENT B ONSHORE OIL PRODUCTION FACILITIES—40 CFR 112.9	☑ NA	PLAN	FIELD

(Drilling and workover facilities are excluded from the requirements of §112.9)
Production facility means all structures (including but not limited to wells, platforms, or storage facilities), piping (including but not limited to flowlines or intra-facility gathering lines), or equipment (including but not limited to workover equipment, separation equipment, or auxiliary non-transportation-related equipment) used in the production, extraction, recovery, lifting, stabilization, separation or treating of oil (including condensate), or associated storage or measurement, and is located in an oil or gas field, at a facility. This definition governs whether such structures, piping, or equipment are subject to a specific section of this part.

112.9(b) Oil Production Facility Drainage

		PLAN	FIELD
(1)	At tank batteries, separation and treating areas where there is a reasonable possibility of a discharge as described in §112.1(b), drains for dikes or equivalent measures are closed and sealed except when drained uncontaminated rainwater. Accumulated oil on the rainwater is removed and then returned to storage or disposed of in accordance with legally approved methods	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	Prior to drainage, diked area inspected and action taken as provided below:		
	• 112.8(c)(3)(ii) - Retained rainwater is inspected to ensure that its presence will not cause a discharge as described in §112.1(b)	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	• 112.8(c)(3)(iii) - Bypass valve opened and resealed under responsible supervision	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	• 112.8(c)(3)(iv) - Adequate records of drainage are kept; for example, records required under permits issued in accordance with §122.41(j)(2) and (m)(3)	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(2)	Field drainage systems (e.g., drainage ditches or road ditches) and oil traps, sumps, or skimmers inspected at regularly scheduled intervals for oil, and accumulations of oil promptly removed	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA

Discussed under Offshore P&P's

112.9(c) Oil Production Facility Bulk Storage Containers
Bulk storage container means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.

		PLAN	FIELD
(1)	Containers materials and construction are compatible with material stored and conditions of storage such as pressure and temperature	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(2)	Except as allowed for flow-through process vessels in §112.9(c)(5) and produced water containers in §112.9(c)(6), secondary containment provided for all tank battery, separation and treating facilities sized to hold the capacity of largest single container and sufficient freeboard for precipitation.	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	Drainage from undiked area safely confined in a catchment basin or holding pond.	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(3)	Except as allowed for flow-through process vessels in §112.9(c)(5) and produced water containers in §112.9(c)(6), periodically and upon a regular schedule, visually inspect containers for deterioration and maintenance needs, including foundation and supports of each container on or above the surface of the ground	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(4)	New and old tank batteries engineered/updated in accordance with good engineering practices to prevent discharges including at least one of the following: • Adequate container capacity to prevent overfill if a pumper/gauger is delayed in making regularly scheduled rounds; • Overflow equalizing lines between containers so that a full container can overflow to an adjacent container; • Adequate vacuum protection to prevent container collapse; or • High level sensors to generate and transmit an alarm to the computer where the facility is subject to a computer production control system	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA

Comments:
TB#5 automatically drains to sump which pumps to produced water tank then SWD

ATTACHMENT B		PLAN	FIELD
(5)	**Flow-through Process Vessels.** Alternate requirements in lieu of sized secondary containment required in (c)(2) and requirements in (c)(3) above for facilities with flow-through process vessels:		
(i)	Flow-through process vessels and associated components (e.g. dump valves) are periodically and on a regular schedule visually inspected and/or tested for leaks, corrosion, or other conditions that could lead to a discharge as described in §112.1(b)	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(ii)	Corrective actions or repairs have been made to flow-through process vessels and any associated components as indicated by regularly scheduled visual inspections, tests, or evidence of an oil discharge	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(iii)	Oil removed or other actions initiated to promptly stabilize and remediate any accumulation of oil discharges associated with the produced water container	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(iv)	All flow-through process vessels comply with §§112.9(c)(2) and (c)(3) within six months of any flow-through process vessel discharge of more than 1,000 U.S. gallons of oil in a single discharge as described in §112.1(b) or discharges of more than 42 U.S. gallons of oil in each of two discharges as described in §112.1(b) within any twelve month period.[12]	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.9(d) Facility transfer operations, pumping, and facility process			
(1)	All aboveground valves and piping associated with transfer operations are inspected periodically and upon a regular schedule to determine their general condition. Include the general condition of flange joints, valve glands and bodies, drip pans, pipe supports, pumping well polish rod stuffing boxes, bleeder and gauge valves, and other such items	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(3)	If flowlines and intra-facility gathering lines are not provided with secondary containment in accordance with §112.7(c) and the facility is not required to submit an FRP under §112.20, then the SPCC Plan includes:		
(i)	• An oil spill contingency plan following the provisions of 40 CFR part 109[13]	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(ii)	• A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that might be harmful	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA

Comments:

[12] Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

[13] Note that the implementation of a 40 CFR part 109 plan does not require a PE impracticability determination for this specific requirement

Flowlines all 112.11

ATTACHMENT B		PLAN	FIELD
(4)	A flowline/intra-facility gathering line maintenance program to prevent discharges is prepared and implemented and includes the following procedures:		
(i)	Flowlines and intra-facility gathering lines and associated valves and equipment are compatible with the type of production fluids, their potential corrosivity, volume, and pressure, and other conditions expected in the operational environment	☑ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
(ii)	Flowlines and intra-facility gathering lines and associated appurtenances are visually inspected and/or tested on a periodic and regular schedule for leaks, oil discharges, corrosion, or other conditions that could lead to a discharge as described in §112.1(b).	☑ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	If flowlines and intra-facility gathering lines are not provided with secondary containment in accordance with §112.7(c), the frequency and type of testing allows for the implementation of a contingency plan as described under 40 CFR 109 or an FRP submitted under §112.20	☑ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
(iii)	Repairs or other corrective actions are made to any flowlines and intra-facility gathering lines and associated appurtenances as indicated by regularly scheduled visual inspections, tests, or evidence of a discharge	☑ Yes ☐ No ☑ NA	☑ Yes ☐ No ☑ NA
(iv)	Oil removed or other actions initiated to promptly stabilize and remediate any accumulation of oil discharges associated with the produced water containers	☑ Yes ☐ No ☑ NA	☑ Yes ☐ No ☑ NA

pressure test annual

ATTACHMENT B ☑ NA ONSHORE OIL DRILLING AND WORKOVER FACILITIES—40 CFR 112.10		PLAN	FIELD
112.10(b)	Mobile drilling or workover equipment is positioned or located to prevent a discharge as described in §112.1(b)	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
112.10(c)	Catchment basins or diversion structures are provided to intercept and contain discharges of fuel, crude oil, or oily drilling fluids	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
112.10(d)	Blowout prevention (BOP) assembly and well control system installed before drilling below any casing string or during workover operations	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	BOP assembly and well control system is capable of controlling any well-head pressure that may be encountered while on the well	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA

Comments:

Are gathering lines tested?

All tested offshore

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